



# WALLETERY PRIVACY POLICY

June 2024

This Privacy Policy (“**Policy**”) serves to illustrate how Walletery Pte. Ltd. (“Walletery”, “**Company**”, or “**we**”, “**us**”, “**our**”) will use and protect your Personal Data in compliance with the Personal Data Protection Act 2012 of Singapore (PDPA). We care for your privacy, and therefore, are committed to managing your Personal Data entrusted to us with the attention it deserves. This Policy applies to the Personal Data collected on the Company’s website at [www.walletery.com](http://www.walletery.com), the Company’s social media, the Company’s mobile application, and any services accessed by you through our website, mobile application, or social media.

This Policy is a document to help you understand how we manage the Personal Data we collect from our customers, as well as why we collect them, how we use them and under what circumstances we will disclose them. Please note that this Policy will be by default supplementary to any other consent you may have given to us in connection to your Personal Data.

Please be sure to regularly check for any future updates to this Policy. We are a company that strives to ensure our information and practices are up-to-date and consistent across the board, and as such, will revise this Policy as new developments and changes in legal and regulatory requirements as well as the industry arise. Any updates will be available on our website at [www.walletery.com/walletery-privacy-policy](http://www.walletery.com/walletery-privacy-policy). Should you wish to find out more about how we manage your Personal Data, please contact us at [support@walletery.com](mailto:support@walletery.com).

## 1. Personal Data

In this Policy, “**Personal Data**” means any data which the Company has, or may have access to, which can be used to identify a person, whether or not the relevant data is correct. Such Personal Data consist of, but not limited to:

- Personal identification information including but not limited to your name and surname in native language as well as in English language, official identification (such as passport, national identification number, photocopies of your identification documents, driver’s license, work permit, residence card, bank statement and utility bill), photo, nationality, gender, date of birth, place of birth, username, telephone number(s), postal address, e-mail address;
- Bank transaction information such as your bank account details, date, time and transaction amount, payment instrument, details of foreign currency exchange, details of cross-border transactions, detailed information of any electronic money exchange between a sender and a receiver such as name, date, time, location, IP address and information about the device used to process the transaction.

## 2. Collecting Personal Data

In order to process, administer and manage your relationship with us, it may be necessary for us to collect, use, disclose or process your Personal Data or other information, at minimum those required in our products or registration forms.





We are committed to protecting your privacy and ensuring security of your information. However, should any unexpected performance error occur in our services that would have an effect on privacy of your information, we shall not be liable in any manner whatsoever for damages or otherwise.

You are required to provide the Company with accurate and complete data. Should any data you have provided change you shall notify the Company of such a change without undue delay.

### **3. Purpose for the Collection, Use, and Disclosure**

We collect, use, disclose or process your Personal Data for the following purposes ("**Purposes**"):

- Processing your application, including but not limited to verifying your identity and evaluating your financial and legal track record, for appropriate provision of our services or products;
- Administering your relationship or account with us;
- Carrying out your instructions or responding to any of your enquiries;
- Processing your requests and any necessary investigations relating to your requests;
- Carrying out due diligence or other screening activities in accordance with legal or regulatory obligations or risk management procedures that may be required by law or by us;
- Dealing with any matters relating to our services or products which you are applying for or have already applied for, including mailing correspondence, statements, invoices, reports or notices, processes which involve disclosing certain Personal Data about you in order to carry out the aforementioned mail delivery, as well as disclosing certain Personal Data on the cover of mail packages;
- Investigating fraud, misconduct, unlawful action or omission, and any suspicion of the aforementioned;
- Complying with applicable law in administering and managing your relationship with us;
- Solving disputes, complying with our legal obligations, detecting and preventing Prohibited Transactions and illegal activities, and
- Any other purposes related to any of the above.

We may also use and process your Personal Data via post, email, telephone call, SMS, mobile app notification, website, and/or online messaging service for marketing and promotional and related purposes such as ("**Additional Purposes**"):

- Providing or marketing services, products and benefits to you, including promotions, loyalty and reward programmes;
- Sending you details of products, services, special offers and rewards, either general for all our users, or which we have identified may be of interest to you.

By agreeing to our Terms and Conditions, of which this Policy is an integral part, you agree that the Purposes and Additional Purposes are reasonable and appropriate.

### **4. Withdrawal of Consent**





You may communicate your objection to our use and/or disclosure of your Personal Data for any of the Purposes or Additional Purposes as stated in this Policy at any time by contacting us at [support@walletery.com](mailto:support@walletery.com).

However, please take note that depending on the nature and specifics of your objection, we may not be able to continue to provide our products or services to you or perform on any contract we have with you.

## **5. Disclosure of Personal Data**

Although we will do our best to protect your personal data, we cannot guarantee the security of your data while it is being transmitted to our Website; any transmission is at your own risk. Once we have received your information, we will use strict internal procedures and security features to prevent unauthorised access. We always take reasonable steps to protect your Personal Data against unauthorised disclosure. To the extent permitted by law, we may transfer or disclose your Personal Data for the Purposes and Additional Purposes stated in this Policy, to the following entities or parties, whether they are located overseas or in Singapore:

- Counterparties and their respective financial institutions in relation to payments and other transactions;
- Monetary Authority of Singapore or other relevant authority;
- Agents, contractors or third-party service providers who provide operational services to us, such as courier services, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival, customer support, investigation services or other services;
- Vendors or other third-party service providers, including but not limited to advertisers and event management companies, in connection with promotions and services offered by us;
- Professional advisors and external auditors, including legal advisors, financial advisors and consultants;
- Co-branded and other business partners; and
- Any other party whom you authorise us to disclose your Personal Data to.

## **6. Accessing Your Personal Data and Correction Requests**

Should you wish to access a copy of or request for correction of your Personal Data held by us, you can submit your request to us via [support@walletery.com](mailto:support@walletery.com).

Please note that we may need to ask for identification details during the process to verify your identity. We reserve the right to refuse your requests to access and/or correct your Personal Data for reasons permitted by law, especially but not limited to the Fifth Schedule of PDPA.

## **7. Retention period**

We value your privacy; therefore, we cease to retain your Personal Data at the end of our mutual relationship. Fundamental Personal Data, such as but not limited to name, surname, customer identification number and number of your identification card or passport are kept for period of 5 (five) years after the end of our mutual relationship.

## **8. Acknowledgement and Consent**





By providing your personal information to us, or using our website, or signing up for or accessing products or services we offer during any of our interactions, you are consenting to the following:

- The Company may collect, use, disclose or process your Personal Data for the Purposes and Additional Purposes as described above;
- The Company may collect Personal Data about you from sources other than yourself and use, disclose or process the same for one or more of the Purposes and Additional Purposes as described above; and
- The Company may disclose your Personal Data to our third-party service providers or agents (including their lawyers) for the Purposes and Additional Purposes as described above.

#### **9. Recording of Telephone Calls and E-mails**

To continuously improve our service, all communications between you and the Company, whether made via telephone calls or e-mails, may be recorded and monitored.

#### **10. Use of Cookies**

The Company, and third parties with whom we partner, may use cookies, tags, scripts, web objects, advertising identifiers (such as mobile device identifiers including but not limited to Google's Advertising ID) and similar technology (hereinafter together referred to as just "**Cookies**") during your use of our website, mobile application and social media channels. Cookies may contain unique identifies and are stored or used in, including but not limited to, your computer or mobile device, emails we send to you, and our web pages. By using our website or mobile application, you consent to us on the usage of Cookies.

You may refer to our Cookie Policy for more details and updates.

